

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

MARIA LOTOCZKY,

Plaintiff,

-v-

CONNECTED VENTURES, LLC,

Defendant.

Case No. 04-74365

Honorable John Corbett O'Meara

Magistrate Judge R. Steven Whalen

SAKIS & SAKIS, PLC

Attorneys for plaintiffs

By: **Raymond S. Sakis** (P19843)

**Jason R. Sakis** (P59525)

Suite 123

3250 West Big Beaver Road

Troy, Michigan 48084

248.649.1160

KUBER LAW GROUP, P.C.

By: Douglas A. Kuber

Attorney for Defendant

575 Madison Avenue, 10<sup>th</sup> Floor

New York, New York 10022

212-813-2680

DRAPER & RUBIN, P.C.

By: David Draper (P43750)

Co-Counsel for Defendant

18580 Mack Avenue

Grosse Pointe Farms, Michigan 48236

313-885-6800

FILED  
2005 JUN -3 P 1:33  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
DETROIT

**PLAINTIFF COUNSEL'S MOTION  
TO WITHDRAW FROM REPRESENTATION**

NOW COMES the plaintiff, MARIA LOTOCZKY, through her attorneys, SAKIS & SAKIS,  
and for the law firm of Sakis & Sakis, states as follows:

SAKIS & SAKIS, P.L.C.  
Attorneys at Law  
3250 W. Big Beaver Rd., Ste. 123  
Troy, MI 48064  
Telephone: (248) 649-1160  
Facsimile: (248) 637-9737

1. The facts recited herein demonstrate that the attorney/client relationship in this case has deteriorated such that the plaintiff refuses to communicate with the law firm of Sakis & Sakis.

2. A letter was sent to the plaintiff along with Defendant's First Set of Interrogatories and Requests for Admissions along with an explanation indicating that she must answer the requests within a timely fashion. The aforementioned letter and materials were sent to her on April 20, 2005. (Exhibit 1).

3. After receiving no indication of forthcoming answers or documents, a call was placed to the plaintiff by the law firm of Sakis & Sakis on May 11, 2005 to remind her of the legal duty to return timely answers and documents so that they could be properly returned over to the defendant. During that conversation, the plaintiff acknowledged her obligation and promised to return the materials forthwith to the law firm of Sakis & Sakis.

4. In addition to the phone call made by Sakis & Sakis on May 11, 2005, a letter was mailed to the plaintiff reminding her of the importance of returning the desired materials and the adverse impact her refusal to comply would have upon her case. (Exhibit 2).

5. Due to the tardiness of the necessary answers and documents, a one week extension to file a response to the defendant's discovery requests was graciously granted by opposing counsel, Douglas A. Kuber - a copy which was provided to the plaintiff. (Exhibit 3).

6. Ms. Lotoczky failed to fulfill her duty of providing answers to the Defendant's Interrogatories, Requests for Production of Documents, and Requests for Admissions on or before the deadline of May 16, 2005, or the extended deadline of May 23, 2005.

7. A certified letter was subsequently sent to the plaintiff confirming the fact that her answers had not been received by the law firm of Sakis & Sakis. (Exhibit 4).

8. Plaintiff has since refused to communicate and/or cooperate with her attorneys.

9. Sakis & Sakis can only take such failures to provide the requested items in a timely manner as an indication that either the plaintiff does not intend to pursue her claim, or alternatively, that she does not intend to communicate with the firm of Sakis & Sakis.

10. Due to the apparent lack of cooperation and the deterioration of the attorney/client relationship in this case, Sakis & Sakis can no longer effectively represent Ms. Lotoczky.

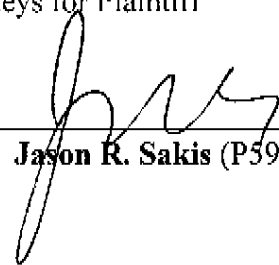
11. For these reasons, plaintiff's counsel is requesting that it be permitted to withdraw from representation.

WHEREFORE, the law firm of Sakis & Sakis respectfully requests that it be permitted to withdraw from representation in this particular matter.

SAKIS & SAKIS, P.L.C.  
Attorneys at Law  
3250 W. Big Beaver Rd., Ste. 123  
Troy, MI 48064  
Telephone: (248) 649-1160  
Facsimile: (248) 637-9737

DATED: June 2, 2005

SAKIS & SAKIS, PLC  
Attorneys for Plaintiff

By:   
Jason R. Sakis (P59525)

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**SAKIS & SAKIS**  
ATTORNEYS AND COUNSELORS  
*Professional Limited Liability Company*  
3250 West Big Beaver Road, Suite 123  
Troy, Michigan 48084  
Tel: (248) 649-1160 Fax: (248) 637-9737

Jason R. Sakis  
E-mail: [jasonsakis@sakislaw.com](mailto:jasonsakis@sakislaw.com)

[www.sakislaw.com](http://www.sakislaw.com)

April 20, 2005

Maria Lotoczky  
3649 Karen Parkway, Ste. 301  
Waterford, Michigan 48328

Re: Maria Lotoczky v. Connected Ventures, LLC  
Case No. 04-74365

Dear Ms. Lotoczky:

Please find enclosed Defendant's First Set of Requests for Admissions to Plaintiff. Defendant's First Set of Requests for Production of Documents to Plaintiff and Defendant's First Set of Interrogatories to Plaintiff. regarding the above referenced matter.

Please answer and provide the requested documents to the best of your ability and return to our office as soon as possible in the self addressed stamped envelope provided..

Thank you for your attention to this matter.

Respectfully,

SAKIS & SAKIS, PLC

Raymond S. Sakis

Enclosure

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**SAKIS & SAKIS**  
ATTORNEYS AND COUNSELORS  
*Professional Limited Liability Company*  
3250 West Big Beaver Road, Suite 123  
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Jason R. Sakis  
E-mail: [jasonsakis@sakislaw.com](mailto:jasonsakis@sakislaw.com)

[www.sakislaw.com](http://www.sakislaw.com)

May 11, 2005

Maria Lotoczky  
650 Red Oak Lane  
Rochester, Michigan 48307

Re: Maria Lotoczky v. Connected Ventures, LLC  
Case No. 04-74365

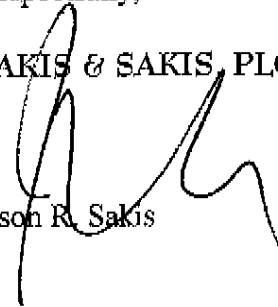
Dear Ms. Lotoczky:

This will confirm that your answers to the Defendant's discovery requests are long overdue. As we mentioned in the previous letter and on your voicemail, it is imperative that you provide us with your answers as soon as possible. They are due with the Court on May 16, 2005. If the requests for admissions are not answered they are deemed to be admitted, so it is very important that you answer them.

Thank you for your assistance.

Respectfully,

SAKIS & SAKIS, PLC

  
Jason R. Sakis

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## SAKIS & SAKIS

ATTORNEYS AND COUNSELORS

*Professional Limited Liability Company*

3250 West Big Beaver Road, Suite 123

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Jason R. Sakis

E-mail: [jasonsakis@sakislaw.com](mailto:jasonsakis@sakislaw.com)

[www.sakislaw.com](http://www.sakislaw.com)

May 16, 2005

VIA FAX AND FIRST CLASS MAIL

212.813.2681

Douglas A. Kuber, Esq.

Kuber Law Group

575 Madison Avenue, 10<sup>th</sup> Floor

New York, New York 10022

Re: Maria Lotoczky v. Connected Ventures, LLC

Case No. 04-74365

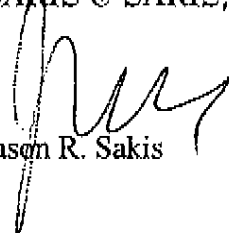
Dear Mr. Kuber:

This will confirm our telephone conversation wherein you granted me a one week extension to file a response to the Defendant's Request for Admissions. My client's failure to timely provide me with her answers, after having been sent two letters requesting same, has forced me to make this request.

Your professional courtesy is greatly appreciated.

Respectfully,

SAKIS & SAKIS, PLC

  
Jason R. Sakis

cc: Maria Looczky

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**SAKIS & SAKIS**  
 ATTORNEYS AND COUNSELORS  
*Professional Limited Liability Company*  
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 Troy, Michigan 48084  
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Jason R. Sakis  
 E-mail: jasonsakis@sakislaw.com

[www.sakislaw.com](http://www.sakislaw.com)

May 18, 2005

**VIA CERTIFIED MAIL**

Maria Lotoczky  
 650 Red Oak Lane  
 Rochester, Michigan 48307

Re: Maria Lotoczky v. Connected Ventures, LLC  
 Case No. 04-74365

Dear Ms. Lotoczky:

This letter will confirm that you have failed to provide us with answers to the defendant's interrogatories, requests for documents and requests for admissions. As you know, your case will be adversely affected by the failure to answer those questions.

Respectfully,

SAKIS & SAKIS, PLC

Jason R. Sakis

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Sent To	MARIA Lotoczky
Street, Apt. No., or PO Box No.	650 RED OAK LANE
City, State, ZIP+4	ROCHESTER, MI 48307

PS Form 3800, June 2002

See Reverse for Instructions

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
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Defendant.

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Attorneys for plaintiffs

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**Jason R. Sakis** (P59525)

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3250 West Big Beaver Road

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**KUBER LAW GROUP, P.C.**

By: Douglas A. Kuber

Attorney for Defendant

575 Madison Avenue, 10<sup>th</sup> Floor

New York, New York 10022

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**DRAPER & RUBIN, P.C.**

By: David Draper (P43750)

Co-Counsel for Defendant

18580 Mack Avenue

Grosse Pointe Farms, Michigan 48236

313-885-6800

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2005 JUN -3 P 1:34  
U.S. DISTRICT COURT  
EASTERN DISTRICT  
OF MICHIGAN  
DETROIT

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NOTICE OF HEARING

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TO: Plaintiff

Please take notice that Plaintiff's Motion To Compel will be brought on for hearing at a date and time to be set by the Court.

**SAKIS & SAKIS, PLC**

Attorney for plaintiff

DATED: June 2, 2005

By: \_\_\_\_\_

Jason R. Sakis

(P59525)

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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-v-

CONNECTED VENTURES, LLC,

Defendant.

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Honorable John Corbett O'Meara

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Co-Counsel for Defendant

18580 Mack Avenue

Grosse Pointe Farms, Michigan 48236

313-885-6800

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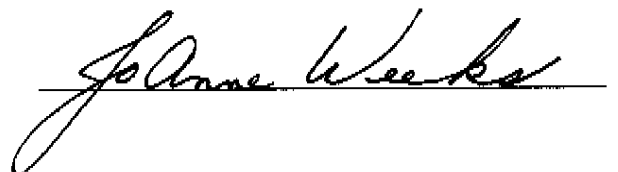
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**CERTIFICATE OF SERVICE**

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The undersigned hereby avers and affirms that a copy of *Plaintiff Counsel's Motion to Withdraw From Representation, Notice of Hearing and Certificate of Service* were served upon the plaintiff at the address listed below, on June 2, 2005, via first class mail:

**Maria Lotoczky**  
650 Red Oak Lane  
Rochester, Michigan 48307



UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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Attorney for Defendant

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New York, New York 10022

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Co-Counsel for Defendant

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313-885-6800

FILED  
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SOUTHERN DIVISION

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**CERTIFICATE OF SERVICE**

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The undersigned hereby avers and affirms that a copy of *Plaintiff Counsel's Motion to Withdraw From Representation, Notice of Hearing and Certificate of Service* were served upon defense counsel at the address listed below, on June 2, 2005, via first class mail.

Douglas A. Kuber  
Attorney for Defendant  
575 Madison Avenue, 10<sup>th</sup> Floor  
New York, New York 10022

